

EXHIBIT i

Correspondence Re Protective Order



Shirley LaVarco <shirley@civilrightscorps.org>

Bruss & Schultz Response to Plaintiff's RFPs

Celena Vinson <cvinson@thompsonhorton.com>
To: Shirley LaVarco <shirley@civilrightscorps.org>

Thu, Oct 26, 2023 at 3:03 PM

Shirley-sorry I missed your call. I tried to call you back. Please try me again. Thanks.

From: Shirley LaVarco <shirley@civilrightscorps.org>
Sent: Thursday, October 26, 2023 9:08 AM
To: Celena Vinson <cvinson@thompsonhorton.com>
Cc: Brittany Francis <brittany@civilrightscorps.org>; Cassidy Kristal-Cohen <cassidy@civilrightscorps.org>; Kathryn Vestal <KVestal@thompsonhorton.com>; Linda Price <lprice@thompsonhorton.com>
Subject: Re: Bruss & Schultz Response to Plaintiff's RFPs

Celena,

Now that the agreed protective order has been filed, would you commit to producing the remaining documents by EOD today, so that there is sufficient time to review them in advance of Defendants' depositions? As you know, we are based on the east coast and traveling to Houston to review them would be unduly burdensome, especially with trial set in April.

Thanks,

Shirley

Shirley LaVarco | Attorney

she/her/hers

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Civil Rights Corps

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Admitted to practice in the District of Columbia.

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On Wed, Oct 18, 2023 at 7:10 PM Celena Vinson <cvinson@thompsonhorton.com> wrote:

Dear Counsel,

Attached please find the responses and objections to your client's request for productions. Until we agree on a protective order, I cannot produce a bulk of the responsive documents. The documents that do not contain sensitive and confidential information are contained in the attached folder. In an effort to provide you with information you requested, we have produced ALL of the recordings without redactions. However, we will be seeking protection of private information and video recordings portraying victims/ reportees or members of the public. Please advise if you are opposed or unopposed to an order that protects this information.

Thomas v. Johnson et al. Discovery Production

Please let me know if you have any questions or wish to discuss.

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